

11 CIV. 4607

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Rajeev Pahuja

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

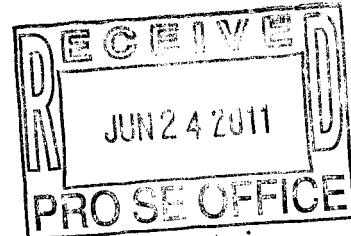
\_\_\_\_ Civ. \_\_\_\_ ( ) ( )

-against-

American University of Antigua  
c/o Greater Caribbean Learning  
Resources

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

**APPLICATION FOR THE  
COURT TO REQUEST  
PRO BONO COUNSEL**



I, Rajeev Pahuja, (print or type your name) am a party in this case and cannot afford an attorney. I ask the Court to request *pro bono* counsel to represent me in this action. **I understand that even if the Court grants this application, I will receive *pro bono* counsel only if an attorney through Court's *Pro Bono* Program volunteers to take my case and that there is no guarantee that an attorney will volunteer to represent me.**

1. In support of my application, I provide the following information: (Use additional paper if necessary.)

A. Have you asked the Court to request *pro bono* counsel in this case before? If yes, when were your prior applications filed and what has changed in the status of your case since you last asked the Court to request *pro bono* counsel?

No, I have never requested a *pro bono* counsel in this case before.

B. Requests for *pro bono* counsel are rarely granted at the early stages of a case and usually not before the Court has issued a decision on the merits of the case. What has happened in your case that demonstrates the potential merit of your case?

I was terminated based on having Attention Deficit Disorder under the Americans with Disabilities Act. Under the Americans with Disabilities Act, a reasonable accommodation is entitled.

C. Explain why you need an attorney in this case.

*I need an attorney in the case because I cannot afford to pay legal fees in New York City. Such as a consultation fee and a retainer.*

D. Explain what steps you have taken to find an attorney and with what results.

*(Please identify the lawyers, law firms or legal clinics you have contacted and their responses to your requests. If you have limited access to the telephone, mail, or other communication methods, or if you otherwise have had difficulty contacting attorneys, please explain.)*

*I have contacted so many attorneys in New York City and the legal fees are \$600 - \$12,500 - \$10,000 which I cannot afford. (Attached is a list of attorney I have contacted.)*

E. If you need an attorney who speaks a language other than English, state what language(s) you speak:

*I speak Hindi fluently and would prefer to have an Indian attorney because the company is Indian.*

2. In further support of my application, I declare that (check appropriate box):

I have previously filed a Request to Proceed *In Forma Pauperis* in this case, and it is a true and correct representation of my current financial status.

I have not previously filed a Request to Proceed *In Forma Pauperis* in this case, and now attach an original Request to Proceed *In Forma Pauperis* detailing my financial status.

I have previously filed a Request to Proceed *In Forma Pauperis* in this case, however, my financial status has changed. I have attached another Request to Proceed *In Forma Pauperis* showing my current financial status.

3. I understand that if an attorney volunteers to represent me and that attorney learns that I can afford to pay for an attorney, the attorney may give this information to the Court.

4. I understand that if my answers on this application are false, my case may be dismissed.

5. **I declare under penalty of perjury that the foregoing is true and correct.**

Dated: 06/24/11

  
\_\_\_\_\_  
Signature

06/24/2011

United States District Court  
Southern District of New York  
500 Pearl Street, Room 230  
New York, NY 10007

Re: List of Attorneys Contacted.

1. Leed, Morelli, and Brown
2. Valli, Kang, and Vassini - retained for negotiation only. Could not afford the legal fees in federal court.
3. New York City Bar Association - a list of attorneys more than 12.
4. Cutten and Golden
5. Tracey Bernstein
6. Daniel Knauth
7. MSEK Law Firm
8. Blitz and Levin
9. Adam Mitzner
10. Barry Janay
11. David Fish
12. Robert Felix - Attorney at Law
13. Debra Roskin - Attorney at Law
14. Janet Nesis - Attorney at Law
15. Guy Phelan - Cutten and Golden
16. There are many more.